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Vince -
please file
with Notification
form
JD

Linda Dawson
DONALD W. MOOS
Director

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504 • (206) 753-2353

January 8, 1982

Mr. Vic Durham
Hardel Mutual Plywood WAD009262072
1210 West Bay Drive
P. O. Box 365
Olympia, Washington 98507

Subject: Resource Conservation and Recovery Act (RCRA)
Compliance Inspection conducted on December 9, 1981

Dear Vic:

I would like to extend my thanks to you and Gaylen Bryan for your cooperation and time during the recent RCRA inspection. As per our discussion, it does not appear that any of your waste streams meet 40 CFR (RCRA) criteria for hazardous waste. Accordingly, I have sent a memorandum to Tom Cook, Department of Ecology, Headquarters, with a copy to Linda Dawson, EPA Region X, stating that your facility does not appear to fall under RCRA.

During the inspection, there were some potential practices/areas of concern to the Washington Department of Ecology (WDOE). Some current situations at Hardel Mutual Plywood may be in violation of State Water Pollution Control laws (RCW 90.48) and/or State Hazardous Waste laws (WAC 173-302). The following list of concerns need to be dealt with in a expeditious manner:

1. On occasion, it becomes necessary to dispose of excess phenolic glue waste/wash water at the Thurston County Landfill via Jones Septic Service pumper truck. In that this material has not been tested against State Hazardous Waste laws, you have two options. The first, and most desirable, is to acquire sufficient tankage so that excess glue waste can be held until it can be bled into the recycle system. A secondary containment system (i.e., dike) should be included if this option is chosen. The second option is to have a representative sample of glue waste analyzed for total phenol, pH and fish toxicity at 100 and 1000 ppm. If this material does not meet existing state hazardous waste criteria, you may be allowed to continue present disposal practices for the time being, with county health department approval. We have discouraged landfill operators from accepting liquids due to the potential for groundwater contamination. If the glue waste meets the criteria, you will be required to dispose of this material at a designated hazardous waste disposal site.

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2. The Glidden Panel Patch applicator gun cleaning waste needs to be tested against State Hazardous Waste criteria. A fish toxicity (bioassay) test will be required in order to determine if present disposal practices are adequate.
3. The 100,000 pound reserve phenolic resin tank located just outside the glue mixing area shows evidence of spillage to ground. Under RCW 90.48, we could require secondary containment due to the potential for contamination of waters of the state. At this time, I am requesting that you dike around the tank with concrete, cinder block, or similar material in order to prevent any spilled material from reaching Budd Inlet or groundwaters. The dike should be totally sealed and large enough to contain the volume of the tank plus ten percent. Storm run-off within the diked area will need to be analyzed, prior to discharge, to ensure that no pollutants are present or pumped into the glue recycle system. Another option would be to build a roof over the diked area in order to exclude rainwater.

I strongly recommend that you decide to procure enough additional tankage to hold all glue waste for recycling. The State of Washington is working closely with the Environmental Protection Agency (EPA) and in early 1982 will most likely be sole administer of the hazardous waste law. The Washington Department of Ecology has drafted Washington State Dangerous Waste regulations that are more stringent than RCRA. When WDOE gets the program, your phenolic glue waste will probably meet the criteria of the new state regulations and you will be required to discontinue your present practice of disposing of this material at the local landfill.

During this inspection, I expressed concern over the practice of selling isocyanate drums for burning barrels. Further investigation has convinced me that this practice is not in violation of state or federal hazardous waste laws. You should ensure that the drum lids are removed and that the remaining isocyanate is allowed to drain out prior to selling. Please be advised that your company could be liable for damages/injuries if someone is injured while using one of your isocyanate drums as a burning barrel. Isocyanate produces some toxic decomposition products when burned, such as isocyanic acid, methylenes, and some cyanide gas. Proper cleaning prior to sale should reduce any risks considerably. For further information concerning the decomposition products of this material (chemical name Polymethylene polyphenyl-isocyanate), contact Phil Peters at the Washington Department of Labor and Industries in Olympia (206-753-4478). Any isocyanate drums disposed of at the local landfill will need to be triple-rinsed with a suitable solvent first.

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Please submit to this office a plan as to how you will deal with items 1. through 3. above by February 15, 1982. This plan should include completion timetables and plans and specifications for the dike(s). Contact me and I may be able to help you with required analysis, depending on our laboratory workload.

If you have any questions or if you feel you will be unable to meet the February 15, 1982 deadline, please call me in Olympia (206) 753-6949.

Sincerely,

Will Abercrombie

Will Abercrombie
Environmental Quality Inspector

WA:si

cc: Tom Cook, WDOE
Neil Thompson, EPA Region X
Linda Dawson, EPA Region X
Vic Berube, Thurston County Public Works